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March 22, 2012

William Lake
Chief, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations, MM Docket No. 00-168

Dear Mr. Lake:

I write to amplify on the presentation made by Allbritton Communications Company on January 27, 2012 regarding potential options for online posting of stations' Public Inspection Files.

As we noted, Paragraphs 36-38 of the NPRM requested input on a "structured or database-friendly" public file that could be "aggregated, manipulated and more easily analyzed." The Commission pointedly concluded, "*That is our ultimate goal.*" Comment was sought on the investment and effort to establish a searchable database, necessary steps to upload electronic documents and whether that is technically feasible. Specific advice was sought as to the burden of providing data in native/primary electronic formats. Frankly, the conclusion and the questions greatly concerned us in that it could substantially change the process of selling advertising time.

Our presentation focused on the issues particularly as they relate to the political section of the Public File. We attempted to make the point that loading political file information onto a centralized, searchable database could impose significant burdens on broadcasters since it would necessarily require major modifications to all trafficking systems for all television broadcasters. Significant software changes would be necessary to match a uniform, commonly coding protocol dictated by the Commission and the effort to comply would unavoidably affect the way all commercial time would be sold. Our comment on this issue in a January 27, 2012 *ex parte* filing summarizing a conversation with Commissioner McDowell's office and analogizing this to a "soviet-style" standardization system was meant to address solely this aspect of the NPRM. Apart from other concerns raised in the proceeding regarding jurisdiction and the wisdom of posting proprietary information online, to the extent that the Commission is not contemplating such a national, government-directed, searchable database, our concerns would be appreciably reduced. Our hope is that the Commission will not pursue its "*ultimate goal*" preliminarily approved in the NPRM.

In accordance with the Commission's rules, this letter also is being filed electronically in the above-referenced docket. Please let me know should you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerald N. Fritz".

Jerald N. Fritz
Senior Vice President,
Legal and Strategic Affairs